



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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March 13, 2025

By ECF

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Khalil v. Joyce*, 25-cv-1935 (JMF)

Dear Judge Furman:

This office represents the government in this case. We write respectfully to notify the Court that we have filed a Supplemental Declaration of William P. Joyce (ECF No. 36) to clarify and correct the first sentence in paragraph 7 of the Joyce Declaration (ECF No. 32), which we filed yesterday in support of our motion to dismiss or transfer. Paragraph 4 of the Supplemental Joyce Declaration provides the amended statement. We further note that in reciting the factual background in the government's memorandum of law in support of its motion (ECF No. 31)—specifically, the third sentence on page two of the brief—we tracked the language of paragraph 7 of the Joyce Declaration, which should now contain the language in paragraph 4 of the Supplemental Joyce Declaration.

We apologize to the Court for the error and inconvenience, and we thank the Court for its consideration of this matter.

Respectfully submitted,

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cc: Counsel of Record (by ECF)